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Before the

California Energy Commission

Sacramento, California

California Energy Commission 2005 Update Residential & Nonresidential Building Standards) Docket # 01-BSTD-1

Comments of the National Electrical Manufacturers Association

November 18, 2002

NEMA appreciates the opportunity to comment on the California Energy Commission 2005 Update Residential & Nonresidential Building Standards, Title 24. We note the Workshop Draft 2 document for discussion at the November 18, 2002, meeting and request that our comments be considered at the meeting. We reserve the right to provide further comments on this or other relevant topics.

I am Edward Gray, Director of Energy Policy for NEMA. I am responsible for developing energy policy positions with NEMA ' s members and for coordination of these positions with the US Congress, US Department of Energy, US Environmental Protection Agency, US Federal Energy Regulatory Commission, and state agencies. I have a MS degree in engineering and have worked in numerous aspects of the electricity business for over 30 years. During the course of this proceeding I have provided comments to the Commission on several occasions on such topics as lighting power allowances, lighting controls, and hardwired lighting.

The National Electrical Manufacturers Association (NEMA) is the leading trade association in the United States representing the interests of electroindustry manufacturers. Its 450 member companies manufacture products used in the generation, transmission and distribution, control, and end-use of electricity, including many products directly impacted by the regulations being contemplated. Annual shipments of these products to US destinations total \$100 billion.

NEMA worked as a committed reliable source of information with the Governor's Office, CEC, CPUC, State and Consumer Services Agency, and the Technology, Trade and Commerce Agency during the electricity crisis and SB 5X and AB 29X development. We are very interested in continuing to help California increase its energy efficiency and hope you will give our comments strong consideration.

We fail to see how many of the proposed regulations impact the goal of the California legislation, which we understand to be peak load reduction. For example, it is difficult to imagine how shutting off outdoor lighting long after the evening peak load would reduce it. We believe that a performance measure of, for example, peak load reduction should be determined for each topic for which a revision is proposed. Revisions that fail to provide a threshold peak load reduction should not be pursued. The US Department of Energy does something analogous to this to determine if new product efficiency standards are to be proposed; in the DOE case a product has to achieve a 1 Quad savings nationwide over its lifetime to be considered for regulation. This approach could be a part of the cost- effectiveness assessment that the legislation requires. The CEC would need to assess the cost part of the equation as well as the benefit side. Here we are many months into the Title 24 2005 revision process without cost benefit or technical analyses having been provided, as required for the standards.

Proposed changes that have potential adverse safety impacts should be either discarded or thought through very carefully before pursuing. For example, reducing outdoor lighting to the point where a lighting level minimum becomes the maximum that is allowed when determining allowable energy use is probably a very bad idea. In such a case manufacturers would not wish to be liable for the possible implications of such an approach. In the IEC world I used to work in safety considerations overrode performance considerations.

Again, thank you for the opportunity to comment. We at NEMA look forward to working with you further on the 2005 amendments under development.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Edward Gray", with a stylized, cursive script.

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